

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

)	
)	Chapter 11
)	Case No. 01-01139 (JKF)
In re: W.R. GRACE & CO., et al.,)	Hearing Date: TBD
)	
Debtors.)	
)	Re: Docket Nos. 13406, 15527, and 15686

EMERGENCY MOTION TO RESCHEDULE

Motley Rice claimants,¹ move for an order continuing the hearing of thirteen (13) claimants presently scheduled for June 26, 2007, and in support of its motion state that:

1. Currently, the trial fifteen (15) claims on the basis of statute of limitations, as well as twenty-eight (28) claims on the basis of product identification are to be heard on June 26, 2007.
2. Anne Kearse from the law firm of Motley Rice is counsel for thirteen (13) of the claims subject to the statute of limitations hearing, but none of the product identification claims to be heard on June 26, 2007. These claims are:

CHP Associates Inc.	Claim No. 2977
American Legion	Claim No. 3406
Capital Campus-General Administration Building	Claim No. 6937
Edmunds Community College	Claim No. 6938
Washington State University	Claim No. 6939
Washington State University	Claim No. 6940
Washington State University	Claim No. 6941
Washington State University	Claim No. 6942
Washington State University	Claim No. 6943
Washington State University	Claim No. 6944
Port of Seattle	Claim No. 6945

¹ CHP Associates Inc. (Claim No. 2977); American Legion (Claim No. 3406); Capital Campus-General Administration Building (Claim No. 6937); Edmunds Community College (Claim No. 6938); Washington State University (Claim No. 6939, 6940, 6941, 6942, 6943, 6944); Port of Seattle (Claim No. 9645, 9646, 9647).

Port of Seattle	Claim No. 6946
Port of Seattle	Claim No. 6947

3. Ms. Kearse is serving as lead plaintiff's counsel for an asbestos trial taking place in West Virginia circuit court which began on May 23, 2007. This trial is expected to last at least three weeks, and is likely to continue longer.
4. The thirteen (13) Motley Rice claimants request that the June 26, 2007 hearing as to Debtor's objections on the basis of statute of limitations for these thirteen (13) Motley Rice claimants be rescheduled until late summer or fall of 2007.
5. Counsel for the Debtor has agreed not to oppose the rescheduling of the hearing on statute of limitations as to these claimants.

Dated: May 29, 2007.

Respectfully Submitted by:

JASPAN SCHLESINGER HOFFMAN LLP

/s/ Laurie Schenker-Polleck

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